

UNITED STATES DISTRICT COURT

for the

Western District of Texas**FILED**

January 26, 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

United States of America

v.

Juan Ramon Hernandez-Limon
XXX XXX 126BY: AC

DEPUTY

Case No. **SA:25-MJ-123**Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 26, 2025 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

8 U.S.C. § 1326(a) & (b)(2)

Illegal Reentry

Penalties: Maximum Penalties: 20 years confinement, \$250,000 Fine or
Both; 3 years supervised release, \$100 mandatory special assessment.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

MICHAEL N DRYJA

Digitally signed by MICHAEL N

DRYJA

Date: 2025.01.26 14:46:41 -06'00'

Complainant's signature

Michael Dryja, Deportation Officer

Printed name and title☐ Sworn to before me and signed in my presence.☒ Sworn to telephonically and signed electronically.Date: January 26, 2025City and state: San Antonio, Texas*Judge's signature*

Honorable Henry J. Bemporad, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

Being duly sworn, I declare that the following is true and correct to the best of my knowledge.

My name is Michael Dryja and I am a Deportation Officer with Immigration and Customs Enforcement (ICE) and with whom I have been employed since January 3, 1999. I am authorized by the United States Department of Homeland Security to enforce the Immigration Laws and Regulations of the United States or any other Laws or Regulations designated by the Attorney General or his successor, the Secretary of the Department of Homeland Security.

On or about January 6, 2025, Juan Ramon Hernandez-Limon (hereafter HERNANDEZ) a native and citizen of Mexico who was previously removed from the United States to Mexico, came to the attention of ICE during record checks of previously removed subjects. ICE ERO officers conducted an investigation to determine if HERNANDEZ received permission to re-enter the United States, which included conducting Immigration database queries—it was confirmed that HERNANDEZ is in the United States without authorization.

Databases revealed that HERNANDEZ is a national and citizen of Mexico with assigned alien registration number XXXX XXX 126 in the Enforce Alien Removal Module (EARM), a Department of Homeland Security database. EARM revealed that HERNANDEZ is an alien who has been previously removed from the United States to Mexico on or about September 23, 2024.

On January 26, 2025, ICE officers conducted physical surveillance of the target address in San Antonio (within the Western District of Texas) that was discovered during record checks. ICE Officers observed an adult male matching the photograph and physical description of HERNANDEZ arrive at the residence in a pickup truck. Officers approached HERNANDEZ as he was standing in his driveway. HERNANDEZ immediately ran into the target residence. Officers set up a perimeter around the house and observed HERNANDEZ run out the back door. HERNANDEZ immediately observed Officers in the backyard and proceeded to run back into the target residence.

Officers have maintained a continuous perimeter around the target residence since.

Record checks indicate that HERNANDEZ was convicted on April 28, 2021 in the United States District Court, Western District of Texas, San Antonio Division for the offense of Illegal Re-Entry into the United States and Alien In Possession Of A Firearm, and was sentenced to Twelve-months-plus-one-day confinement.

Record checks further indicated that HERNANDEZ was convicted on February 8, 2024 in the United States District Court, Western District Of Texas, San Antonio Division for the offense of Illegal Re-Entry into the United States and was sentenced to 15-months' confinement.

Immigration databases also revealed that HERNANDEZ has not been granted permission to reapply for admission from the Attorney General of the United States, or his successor, after deportation/removal.

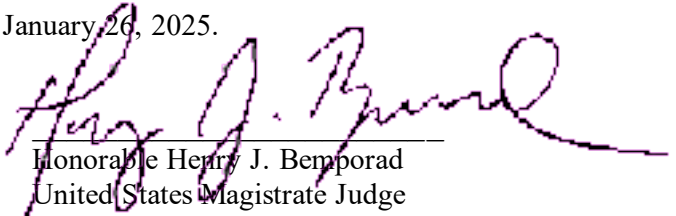
Based on the foregoing facts, I believe that HERNANDEZ is an alien who has illegally re-entered the United States after being removed, without authorization from the proper authorities, in violation of Title 8, United States Code, Section 1326(a) & (b)(2).

**MICHAEL N
DRYJA**

Digitally signed by
MICHAEL N DRYJA
Date: 2025.01.26
14:47:29 -06'00'

Michael Dryja
Deportation Officer
Immigration and Customs Enforcement

Sworn to telephonically and signed electronically on January 26, 2025.



Honorable Henry J. Bemporad
United States Magistrate Judge